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From:

Jill McGrand <jillmcgrand@gmail.com>____

Sent:

Monday, March 30, 2020 4:08 PM

To: Subject: usa0622@fedex.com [EXTERNAL] COMPLAINT RECEIVED

MAR 31 2020

CLERK, U.S. DISTRICT COURT MINNEAPOLIS, MINNESOTA

COMPLAINT:

7- My tAssociation denied Access to my wife, a disabled member, on Wheel Chair, and handicapped, and me, the 100% care giver.

HOW:

"HOA" Management did not even acknowledge a disability existed, an access required, and an authorization due. The Parkland Estate Association, "HOA", Agents, Employees, Manager, & Attorney, jointly and severally are liable for breach of contract, the equal protection, and ADA violation....

Failure to adhere to Federal/State laws in acknowledging,

Authorizing, nor practicing of the reasonable access for a handicap, on wheel chair, requiring a ramp. Ignored Disability rights of any members in their by laws, nor practice reasonable care in an accommodation for a wheelchair member, and the care giver, who would be forced to carry her in and out of the home, minimum of twice a day.

B: Retaliating by, filing for sheriff's auction, as demand to comply resulted in

Protest, withholding the association fees. C: Concentrating on punishing the member financially, by hiring a collector attorney, who would withhold compliance, for nine months, (Jan, 2017 to Nov. 2017), until member was in death bed, hospital,

Passed 3/31/2018, &

Never an adequate access completed.

- D: The fact of its inaccessibility's evidence remains today, for jury's visit, and circumstances, to see the violation, for themselves. It is impossible to roll in & out. The hinges do have to be changed to allow the door to open 180 degrees Instead of 90 degrees. The Door Frame has to alter to allow the maneuver, on sides, & bottom....
- 8- "WE DON'T HAVE ANY PROVISIONS TO ALLOW THAT". Said the Manger, Cheryl Donley-It's Not, in our By Laws, It's not something "HOA", the Association can assist you with.... CherylD@citiesmanagement.com
- A: From in unit file: common areas, and elements- are the responsibility of the Association, and not something that any homeowner can do... From "HOA", Home Owner Association's, through the rules of Association's own governing document.
- B: A work order, to authodrize a limited work to be done, on your behalf and at no charge to "HOA" is required for any work to be performed, in common areas, and elements.

THE DESCRIPTIONS, BRIEFLY, OF FACTS, DEFENDANTS' VIOLATION OF THE LAW:,HOW:WHERE:

,WHEN:, and THE HARM THAT THE DEFENDANTS

INFLICTED:

Is detailed in written, documentary Emails, phone calls, letters to be amended. This complaint is the initial, Preliminary one.

A formal complaint is to follow to complete any/all details.

9- The plaintiffs do hereby request for the relief of Monitory damages of \$800,000.00-Eight hundred Thousand US Dollars against the Defendants- or what ever the court may deem just for the violations, and harm to plaintiff.

Sent from my iPhone

